

ERIC GRANT  
United States Attorney  
ANTONIO J. PATAKA  
JUSTIN GILIO  
Assistant United States Attorneys  
2500 Tulare Street, Suite 4401  
Fresno, CA 93721  
Telephone: (559) 497-4000  
Facsimile: (559) 497-4099

Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JAMES EARL MELO,  
  
Defendant.

CASE NO. 1:24-CR-00055-JLT-SKO

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER

**STIPULATION**

1. By previous order, this matter was set for trial on February 3, 2026.
2. By this stipulation, defendant now moves to vacate the trial date as to him only and set a change of plea hearing on February 9, 2026. The parties further agree and stipulate to exclude time between February 3, 2026, and February 9, 2026, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The discovery associated with this case is voluminous and includes tens of thousands of pages, including investigative reports, photographs and videos, as well as hundreds of hours of recorded telephone conversations pursuant to wiretap orders, cellular phone extractions, and large amounts of cellular telephone precise location data and vehicle tracker data. All this discovery has been either produced directly to counsel, and/or made available for

inspection and copying.

b) Counsel for defendant desires additional time to consult to prepare for the change of plea hearing and conduct investigation in support of mitigation for sentencing.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

4. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of February 3, 2026, to February 9, 2026, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

5. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: December 2, 2025

ERIC GRANT  
United States Attorney

/s/ ANTONIO J. PATACA  
ANTONIO J. PATACA  
Assistant United States Attorney

1 Dated: December 2, 2025

/s/ DANIEL L. HARRALSON  
DANIEL L. HARRALSON  
Counsel for Defendant  
JAMES EARL MELO

10 **ORDER**

11 IT IS SO FOUND.

12  
13 IT IS SO ORDERED.

14 Dated: **December 2, 2025**

  
UNITED STATES DISTRICT JUDGE